

# **EXHIBIT 2**

Jaishree Capoor, M.D.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

- - -

IN RE DEPAKOTE CASES: : Case No.  
: 3:12-cv-52-  
: NJR-SCW  
: (Lead  
: Consolidated  
: Case)  
D.B., a minor by IRINA :  
BURNETT, individually :  
as parent and next :  
friend of D.B., : Case No.  
Plaintiffs, : 3:12-cv-53-  
: NJR-SCW  
v. :  
:  
ABBOTT LABORATORIES, :  
INC., :  
Defendant. :

- - -

November 7, 2017

- - -

Oral expert deposition of  
JAISHREE CAPOOR, M.D., taken pursuant to  
notice, was held at the law offices of  
Heninger Garrison Davis, LLC, 250 Park  
Avenue, 7th Floor, New York, New York,  
beginning at 9:04 a.m., on the above  
date, before Kimberly A. Cahill, a  
Federally Approved Registered Merit  
Reporter and Notary Public.

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1 Right?

2 A. Yeah.

3 Q. And so you would have a  
4 focus on pediatric physical medicine;  
5 correct?

6 A. Yes.

7 Q. And I think in looking at  
8 your testimony in Erpelding, you  
9 described yourself on numerous occasions  
10 as a pediatric physiatrist?

11 A. Correct.

12 Q. Does that accurately  
13 describe your area of expertise?

14 A. Correct.

15 Q. What does that mean exactly,  
16 pediatric physiatrist?

17 A. A physiatrist is a  
18 specialist in physical medicine and  
19 rehabilitation. It's just -- same  
20 terminology, same description.

21 Q. And how about the pediatric  
22 part of that?

23 A. I'm subspecialty boarded in  
24 pediatric physiatry -- pediatric physical

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1 effort when I can, but there are  
2 circumstances when families are unable to  
3 -- if there is a shortage of specialists  
4 or something and they're unable to  
5 commute, these sort of decisions about  
6 braces and equipment can be made through  
7 a telemedicine examination.

8 Q. It's a rare case, is it not,  
9 that you would actually do an assessment  
10 of a patient in your private practice  
11 without doing an actual physical  
12 examination? Is it not, Doctor?

13 A. Correct, yes.

14 Q. I want to ask you about --  
15 so this article that you did with Dr.  
16 Cancel appears in the -- is it the  
17 Physical Medicine Rehabilitation Clinics  
18 --

19 A. Of North America.

20 Q. -- of North America? Okay.  
21 Great.

22 What can you tell us about  
23 that journal, that publication?

24 A. Oh, it's a peer-reviewed